



November 19, 2021

Steffany Powell Coker  
Public Service Commission  
P.O. Box 7854  
Madison, WI 53707-7854

**RE: Quadrennial Planning Process IV Scoping Memorandum**

Dear Steffany Powell Coker,

RENEW Wisconsin (RENEW) appreciates the opportunity to comment on the Public Service Commission (Commission) staff's Quadrennial Planning Process IV Scoping Memorandum. RENEW supports the planning process outlined in the scoping memorandum and the topics included for investigation in the memorandum. RENEW recommends adoption of Alternative Two: Approve the scope with modifications.

RENEW supports the alignment of the Phase I macro priorities and policies with the topics identified in the Roadmap to Zero Carbon (Docket 5-EI-158). RENEW also supports the comprehensive inclusion of five considerations of cost-effectiveness decisions included in the scoping memorandum. RENEW will explore these topics further in response to future memoranda prepared by Commission staff addressing Phase II issues. Particularly, RENEW looks forward to further opportunities to comment on the calculation of carbon value and avoided transmission and distribution costs.

RENEW suggests the following modifications to the scope and planning process:

**Comment Period**

RENEW suggests a modification to the timeline outlined in Table 1 to extend the comment periods for Phase I and Phase II. The current timeline specifies two-week comment periods for both Phase I and Phase II, and RENEW recommends extending these comment periods to three weeks each. These extensions would align the two comment period durations with the comment period duration on the scope memorandum. RENEW encourages this change to allow more thorough and comprehensive comments from stakeholders as the macro policy decisions and micro implementation decisions are made.

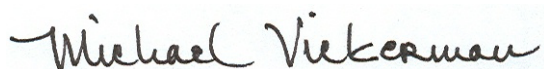
## Electrification Programs

RENEW suggests an expansion of Phase I, Topic #2: “Electrification Programs and Offerings”. This Topic should be expanded to specify two Subtopics of beneficial electrification to include in Focus on Energy program planning. The first Subtopic, which we propose as #2a, would specifically address policies and programs to support electrification through **fuel switching from heating oil or propane** to electricity. Specifically addressing fuel switching from delivered fuels to electricity would be a new area for Focus on Energy and could support rural customers in Wisconsin. The second Subtopic, which we propose as #2b, would explore electrification policies and programs to support electrification through **fuel switching from natural gas**. This subtopic would not represent a shift in customers who could take advantage of Focus on Energy programs but could encourage existing customers to electrify their appliances and buildings. Both Subtopics would investigate how such electrification would support carbon reduction and decarbonization goals aligned with the Roadmap to Zero Carbon investigation through further electrification of building appliances and systems (such as space and water heating as well as cooking) that would otherwise use **fossil fuels**.

Electrification of buildings can lead to climate<sup>1</sup>, health<sup>2</sup>, and economic benefits.<sup>3</sup> The size of these benefits depends on the fuel that is being replaced by electricity. RENEW suggests exploring the impacts of building electrification for delivered fuels such as propane and heating oil as well as the impacts of building electrification for natural gas as the benefits might be distinct and have different implications for program design. The Commission should consider both programs and policies that support electrification of appliances and those that support full-home electrification. RENEW looks forward to providing comments during the Phase I comment period to expand on the importance of full-home electrification.

RENEW appreciates the opportunity to comment on Commission staff’s draft scoping memorandum and thanks the Commission for consideration of the two modifications described above.

Sincerely,



Michael Vickerman  
Policy Director

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<sup>1</sup> Billimoira, S., Guccione, L., Hennen, M., & L. Louis-Prescott. (2018). *The Economics of Electrifying Buildings*. Rocky Mountain Institute. <https://rmi.org/insight/the-economics-of-electrifying-buildings/>.

<sup>2</sup> Seals, B. & A. Krasner. (2020). *Gas Stoves: Health and Air Quality Impacts and Solutions*. Rocky Mountain Institute. <https://rmi.org/insight/gas-stoves-pollution-health/>.

<sup>3</sup> Billimoira, S., Guccione, L., Hennen, M., & L. Louis-Prescott. (2018). *The Economics of Electrifying Buildings*. Rocky Mountain Institute. <https://rmi.org/insight/the-economics-of-electrifying-buildings/>.